REMARKS

Claims 1, 2 and 4-20 are pending in the application. Claims 19 and 20 stand rejected under 35 U.S.C. §102 as being anticipated by Stam et al., U.S. Patent No. 6,429,594 (hereinafter Stam). Claims 1, 4-12, and 15-18 stand rejected under 35 U.S.C. §103 as being unpatentable over Stam in view of U.S. Patent No. 4,967,319 to Seko.

Regarding the rejection of claims 19 and 20 under 35 U.S.C. §102 in view of Stam, Applicants traverse. Both claims 19 and 20 explicitly recite that the beam pattern includes the beam shape and that the illumination output, as adjusted, also modifies the beam shape, which the Stam reference does not disclose or suggest. Rather, Stam only discloses modification of the illumination intensity and/or range if a vehicle is detected within the glare area. See Column 13, lines 3-20. The techniques used to decrease the "beam pattern" as disclosed in Stam, involve modifications to an illumination range. Stam discloses that the modifications to the illumination range involve adjusting the beam angle and illumination intensity only and Stam does not disclose any modifications to the shape of the beam. The Stam reference fails to disclose modification of the beam shape as claimed in Claims 19 and 20 of the present invention. As Stam fails to disclose at least this claimed feature of claims 19 and 20, Applicants request that the rejections under 35 U.S.C. §102 be withdrawn.

Regarding the rejections of claims 1, 4-12 and 15-18 over Stam in view of Seko, Applicants respectfully traverse. Claim 1 of the present invention has been amended herein to further highlight this distinction. The present invention teaches and claims, a memory element coupled to a controller and storing a plurality of beam patterns. The beam patterns as taught in the present invention involve more than the just the intensity of the beam and the angle of the beam as taught in the Stam reference. The beam patterns of the present invention include angle, focus, amplitude, position and shape. See paragraph [0051] of the specification which describes the beam pattern selected from memory includes adjustments to each of the beam pattern elements.

The Examiner asserted that Stam does not disclose that at least one beam-forming assembly optically coupled to the at least one light source and a controller coupled to the at least one beam-forming assembly, and this is because Stam does not

teach or disclose modifications to the beam shape itself. The Applicants have asserted above, with reference to the discussion relative to the 102 rejection, that Stam does not teach or disclose that adjusting said illumination output as claimed in the present invention. Stam clearly teaches adjusting illumination range by making adjustments to beam intensity, and beam angle only. Further, it is respectfully asserted there is no teaching in Stam to store a plurality of beam patterns in memory, which patterns are elected in response to the object detection signal. Nor would there be as Stam is not capable of modifying a beam shape without a beam forming assembly optically coupled to at least one light source, and a controller coupled to the at least one beam forming assembly.

Illumination range adjustment as disclosed in Stam is made solely on the basis of beam intensity, either low or high, and beam aiming. However there is no teaching or suggestion to modify the beam shape as claimed by the Applicants of the present invention.

Nor is there a teaching or suggestion to elect a beam pattern from a plurality of beam patterns stored in memory as claimed by the Applicants of the present invention. It is respectfully asserted that storing a plurality of beam patterns in memory is neither taught nor suggested in Stam. As indicated by the Examiner with respect to reference number 416, the Stam reference discloses a memory element. However, the memory element disclosed in Stam does not store a plurality of beam patterns. The memory element in Stam is merely for storing and automatically downloading code describing the designed logical operation each time power is first applied. Stam does not teach or disclose that the memory element stores a plurality of beam patterns, nor that it is coupled to the object detection sensor to elect at least one of the plurality of beam patterns as claimed in the present invention. While, Stam discloses two beam intensity patterns, (low and high at column 9), as indicated by the Examiner, it does not teach or disclose that this is a plurality of beam patterns that is stored in the memory unit, nor does it teach that the beam patterns include angle, focus, amplitude, position and shape as claimed in the present invention, nor does it teach that a particular beam pattern is elected from the plurality of stored beam patterns.

The memory element taught in the Stam reference is a serial memory element and downloads code to an ASIC upon power up. It is respectfully asserted that this is significantly different from the present invention in which the controller (18), in response to the object detection signal, elects a beam pattern from a plurality of beam patterns stored in memory (24). As further taught in the present invention, the beam pattern includes angle, focus, amplitude, position and shape, which is not taught in the Stam reference.
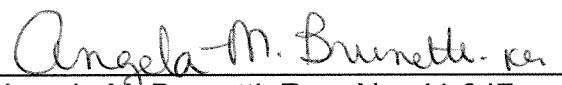
The Examiner indicated that Stam discloses all of the elements of the present invention except for the "at least one beam forming assembly optically coupled to the at least one light source and a controller coupled to the at least one beam forming assembly". It is respectfully asserted that Stam does not disclose all of the elements as indicated in the remarks above, and that even if Stam were to be combined with a reference that discloses the at least one beam forming assembly optically coupled to the at least one light source and a controller coupled to the at least one beam forming assembly", as suggested by the Examiner, that the combination would not result in the Applicant's invention.

It is respectfully asserted that the Stam reference does not teach or disclose storing a plurality of beam patterns (which include beam shape modifications) in the memory unit, nor does Stam teach or disclose electing one of the stored plurality of beam patterns, so that even if Stam were combined with a reference that teaches a beam forming assembly as asserted by the Examiner, that combination would not result in the Applicant's invention. The Examiner asserted that it would have been obvious to one of ordinary skill in the art to combine the headlight apparatus of Seko in the headlight control of Stam in order to adjust the optical of the headlamp such as high beam to low beam. However, as discussed in detail above the beam pattern of the present invention is not limited to the beam intensity and/or beam angle and therefore, such a combination still would not result in the applicant's invention, which also modifies the beam shape in response to the object detection signal by electing at least one of the beam patterns from the plurality of beam patterns.

It is respectfully asserted that the amendments have overcome all of the objections and rejections set forth in the Office Action. The Applicants submit that claims 1 and 4-20 are in a condition for allowance. A Notice of Allowability indicating the same is therefore earnestly solicited. The Examiner is invited to telephone the Applicants' undersigned attorney at (248) 433-7512 if any unresolved matters remain.

Respectfully submitted,

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